

REMARKS

Favorable reconsideration of the present application is respectfully requested.

Claim 1 has been amended to further recite the features of cancelled Claims 2 and 8 that the fixed-side raceway member has a caliper mount provided immovably with the fixed-side raceway member and extending radially outwardly thereof, that the brake caliper is attached to the caliper mount and the brake torque sensor is provided at a base end of the caliper mount, and that the caliper mount comprises a flange integral with the fixed-side raceway member and a caliper mount member separate from the flange and fixed to the flange with a bolt and the strain gauge is affixed to the flange of the fixed-side raceway member. Additionally Claim 1 further recites that the brake caliper is “removably” attached to the caliper mount. Basis for this is the attachment of the caliper via the bolt shown in Fig. 1. The bolt is explicitly recited in new Claim 10.

As was explained in the last response, a sensor equipped hub unit is arranged to detect brake torque values with high accuracy. The present invention provides that the brake torque sensor is provided on the fixed-side raceway member of the hub unit at a location such that the brake torque sensor is fixedly mounted with respect to the fixed-side raceway member. Concerning an example of the new limitations of Claim 1, FIG. 3(a) and FIG. 3(b) show an embodiment wherein a caliper mount 14 comprises a flange 15 integral with the fixed-side raceway member 3 and a caliper mount member 16 fixed to the flange 15 with bolts 17, wherein the strain gauges 2a are affixed to the flange 15.

Claim 8 was rejected under 35 U.S.C. § 102 as being anticipated by Salou et al. However it is respectfully submitted that the present claims define over this reference.

Salou et al discloses a wheel assembly in which the fixed outer raceway 2 of a wheel bearing is carried by a fixed interface 5 in the form of a member having integral projections

43 and 44 by which a caliper 15 may be bolted to the interface. Strain sensors 38 are applied to the projections.

It is respectfully submitted that the subject matter of original Claim 8 defined over this reference. Claim 8 recited that the caliper mount comprises a flange integral with the fixed-side raceway member and a caliper mount member *separate from* the flange and fixed to the flange with a bolt. In contrast, the caliper mount (projections 43 and 44) in Salou et al is integral with the more central part of the interface 5 (fixed-side raceway member). The claimed flange and bolt thus are not present in Salou et al and so Claim 8 was not anticipated.

It is nonetheless Applicants' understanding from the last paragraph of page 2 of the Office Action, and from a brief telephone discussion with Examiner Williams, that he has interpreted the claimed "caliper mount" to be broad enough to read on the portion of the caliper 15 of Salou et al that is bolted to the projections 43-44. Therefore these projections comprise the claimed flange, and the connecting bolts comprise the claimed bolt fixing the caliper mount member to the flange.

Applicants respectfully submit that the "plain meaning," i.e., broadest reasonable interpretation (MPEP § 2111.01), of a "caliper mount" would not include the caliper which is to be mounted by the caliper mount, since this would lead to the logical *non sequitur* whereby the mount for the caliper is the caliper itself. In any case, in view of this interpretation Claim 1 has been amended to further recite that the brake caliper is "removably" attached to the caliper mount. A "caliper mount" which is simply a part of the caliper itself would not result in a brake caliper that is "removably" attached to the caliper mount. For this reason as well, the claims define over this reference.

Claims 4, 5, 7 and 9 were rejected under 35 U.S.C. § 103 as being obvious over Salou et al in view of Kozyra et al '233. However the torque plate 24 of Kozyra et al '233 also

comprises an *integral* fixed-side raceway member and caliper mount member, and so cannot overcome the shortcomings of Salou et al with respect to amended Claim 1.

Additionally, Claim 9 further recites that the fixed-side raceway member is fixed to a knuckle arm on the vehicle body by a knuckle attaching flange provided on the fixed-side raceway member, and the knuckle arm is fixed to the flange of the fixed-side raceway member with the same bolt as the caliper mount member. For example, referring to Figs. 3A-3B, the knuckle arm 6 is fixed to the flange 16 of the fixed-side raceway member 3 with the same bolts 17 as the caliper mount member 16. This permits the flange 15 of the member 3 to serve also as a knuckle attaching flange to reduce the number of bolts to be used and to reduce the number of work steps needed for mounting the hub unit 1 on the vehicle body. Since the torque plate 24 of Kozyra et al '233 comprises an *integral* fixed-side raceway member and caliper mount member, on the other hand, the attachment thereto of the knuckle housing could not teach the claimed knuckle arm fixed to the flange of the fixed-side raceway member "with the same bolt as the caliper mount member." For this reason as well, Claim 9 defines over this prior art.

Claims 4-6 were rejected under 35 U.S.C. § 103 as being obvious over Salou et al in view of Kozyra et al '159. However the bearing carrier 14 of Kozyra et al '159 also comprises an integral fixed-side raceway member and caliper mount member, and so cannot overcome the shortcomings of Salou et al with respect to amended Claim 1. The claims therefore define over this prior art.

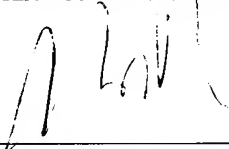
Applicants therefore believe that the present application is in a condition for allowance and respectfully solicits an early Notice of Allowability.

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